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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-5

Chapter 9

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**APPLICATION FOR ORDER SHORTENING TIME AND PRESCRIBING NOTICE OF
HEARING ON MOTION FOR ENTRY OF AN ORDER (1) DIRECTING AND
APPROVING FORM OF NOTICE OF COMMENCEMENT; (2) SETTING
DEADLINE FOR FILING OBJECTIONS TO PETITION;
and (3) FOR RELIEF UNDER CHAPTER 9**

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1 TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY
2 JUDGE:

3 The Debtor, by and through counsel, respectfully seeks an Order Prescribing
4 Notice on its Motion for Entry of An Order (1) Directing and Approving Form of Notice of
5 Commencement; (2) Setting Deadline for Filing Objections to Petition; and (3) for Relief
6 Under Chapter 9 as follows:

7 **RELIEF SOUGHT:**

8 The Debtor seeks an order (1) approving the form and content of the Notice of
9 Commencement of Case; (2) approving the manner of notice by publication; (3)
10 directing the Clerk to mail the Notice of Commencement to all creditors; (4) establishing
11 the deadline to object to the Chapter 9 Petition; and (5) approving the entry of order for
12 relief following the deadline to object. Attached as Exhibit A to the Declaration filed
13 herewith in support of this Application is a copy of the proposed Motion showing the
14 relief sought.

15 **REASON FOR REQUEST:**

16 The Declaration in Support describes the reason for the requested order.

17 **DATE REQUESTED:** November 16, 2017 at 9:30 a.m.

18 WHEREFORE, Debtor requests that this Court enter its Order as follows:

- 19 1. That this Application be granted;
20 2. That the time for notice be shortened;
21 3. That notice be served upon the list of the twenty largest unsecured
22 creditors as amended plus any persons who have requested special notice; the Debtor;
23 Healthcare Conglomerate Associates, LLC, Wilmington Trust as Successor Indenture
24 Trustee and Successor Paying Agent, California Department of Public Health, and the
25 U.S. Trustee's Office.
26 4. The Hearing be held at the above date and time.
27 5. Debtor shall give notice to the required parties on or before November 1,
28 2017, by fax, email or U.S. Mail, postage prepaid;

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6. Objections, if any, can be presented:

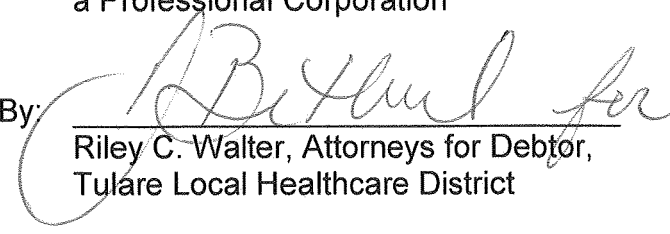
☐ At the time of the ☒ Up to two days prior to the hearing;
hearing; and

7. For such other relief as is just and proper.

Dated: 10/30, 2017

WALTER WILHELM LAW GROUP,
a Professional Corporation

By:


Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District